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Hon. Tonianne J. Bongiovanni
Clarkson S. Fisher Building
& U.S. Courthouse
402 State Street
Trenton, NJ 08608

Re: USA v. Newsholme, 3:17-mj-05015-TJB

Dear Judge Bongiovanni:

I am writing the Court to advise that I am required to withdraw as counsel for Mr. Newsholme. In light of the allegations of Count 4 of the Amended Complaint, a non-waivable conflict of interest has arisen. Pursuant to Rules 1.7 and 3.4 of the Rules of Professional Conduct in addition to controlling case law, I must make this request.

Thank you for Your Honor's kind attention to this matter.

Respectfully,
TOMCZAK LAW FIRM

s/s Gregory Tomczak